

2020 JAN 21 P 2:38

STEPHEN C. DRIES  
CLERK

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT  
FOR THE Eastern DISTRICT OF Wisconsin

(Full name of plaintiff(s))

Clarence Albert Saffold, III

vs

Case Number:

(Full name of defendant(s))

19-cv-1414-pp  
(to be supplied by clerk of court)

Milwaukee County Jail

G4S Secure Solution

Wellpath Healthcare

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at  
(State)

Racine Correctional Institution PO Box 900 Sturtevant, WI 53177  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

Defendants -

Milwaukee County Jail

- Officer Peterson, Officer Nowak, Officer Larcen, Captain Stradden  
in their individual and official capacities

Citizens of Wisconsin, employed at 949 North 9<sup>th</sup> Street Milwaukee, WI  
53233. Who acted under the color of the state law.

Defendants -

G4S Secure Solution

- Officer C. Gilbert, Officer J. Sanchez in their individual and  
official capacities

Citizens of Wisconsin, unknown employment address

who acted under the color of the state law.

Defendants -

Wellpath Healthcare

Nurse Meredith, Nurse Wysocki, Dr. Khan, RN Jines, Jane Doe 1, Jane Doe 2

Jane Doe 3 in their individual capacities. Who acted under the color of  
the state law,

Citizens of Wisconsin, employed at 949 North 9<sup>th</sup> Street Milwaukee, WI

53233

2. Defendant See attachment #1  
(Name)

is (if a person or private corporation) a citizen of See attachment #1  
(State, if known)

and (if a person) resides at See attachment #1  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for See attachment #1  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

## B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

G4S Secure Solutions C. Gilbert and J. Sanchez sued in their individual  
and official capacities, who acted under the color of the state law.

Officials were negligent as well failed to protect from injury by being deliberately indifferent  
to my right to safety.

On July 11, 2019 approx. 2pm I was transported to medical appointment at Froedent  
Eye Institute, as I were incarcerated at Milwaukee County Jail as a pretrial detainee.

I was escorted to transportation van and loaded into. In the process, due to waist restraints  
preventing me from being able to secure safety belts located in van, I asked Gilbert

( to assist me. I pointed out to him that the worst restraints were preventing me because they were unusually high around my wrist as well tight so I couldn't reach down and secure belt myself. Also I stated they be driving crazy from what I've heard by others and I'm not trying to get tossed around as a result. Gilbert stated he couldn't assist and for me to figure it out. This response bothered me so it lead me to further state, "I have a right to safety as he and the other officer do, you both are going up there and putting seat belts on why I gotta ride in a metal box unsecured? If I get injured then what?" I lastly stated to Gilbert by law the DOT states "click it or ticket" so are you all above the law or do my safety not matter because im an inmate. Gilbert stated "whatever dude, figure it out yourself" and slammed the rear doors closed on van. He was agitated and vigorous in manner I could see so I felt unsafe moving forward. He did not state why he couldn't assist in securing safety belt nor why he wouldn't.

( We arrived at Froedert Eye Institute shortly after our exchange. I'm unsure of who was driving due to blacken-out partition in van preventing me from seeing. Soon as rear van doors opened I spoke with Gilbert again. I confronted him as well as Sanchez as he was walking up about the speeds I was being driven at being extremely uncomfortable, unsafe, and uncalled for. Especially unsafe since I was not secure in a seat belt. Sanchez laughed and said "what's the

big deal, we're here no one's hurt, relax man." I went further to say "yeah ya'll had seat belts on so I wouldn't've been concerned either. If you would've crashed or something I would've been severely injured, you all may have not."

At this time I was directed into a wheelchair to provide easy mobility due to me being in leg restraints as well as waist restraints. Before I could fully sit in to the wheelchair and lift my legs off the ground Gilbert started pushing the

chair abruptly causing my feet to drag the ground. I stated "Hey man hold on a sec and <sup>let</sup> ~~let~~ me get situated first. I am in handcuffs and things."

Sanchez stated "That's who's fault" and chuckled. As I turned to <sup>look</sup> ~~looked~~ at

Sanchez after his comment I noticed Gilbert face was frowned up and he was visibly agitated. I stood up to correctly position myself in <sup>the</sup> wheelchair

placing my feet onto 'leg holders' on wheelchair. Gilbert stated "Dude just sit down in the freaking chair and lets get this ~~shit~~ over with." I complied as

I clearly could see he was upset about something and I didn't want to further agitate the situation. I looked at Sanchez and he was attending his cellphone

unbothered by his or <sup>his</sup> partner's remarks and actions. As I was seated properly in chair Gilbert pushed the chair forward aggressively. I just couldn't let this

go without addressing it. I stated "look bro, you are being real careless with

how you're handling me. can you slow down and be careful before you crash into something? I'm not trying to have to report this so please look out."



Gilbert chuckled and said "do what you gotta do."

After going inside hospital, we sat and waited for hospital's security (John Doe) to escort us to designated floor. Once security arrived, approx.

2:45pm-3:15pm, we all went into elevator (Gilbert, Sanchez, Security, and I).

We were to get off on 3<sup>rd</sup> floor but security made a mistake and pressed the

second floor button instead. When we got onto elevator, I was wheeled on first

facing the rear of elevator, then the others followed. If im not mis taking there

was no one else on the elevator besides us four. Once the door opened everyone

proceeded to exit. As I was being wheeled off lastly the security guard

realized his mistake and announced we were on the wrong floor. Gilbert

maneuvered wheelchair aggressively in attempt to get off elevator quickly but

was interrupted by security's correction. Instead of diligently maneuvering

chair he proceeded carelessly and swung chair to the left instantly making

contact with elevator wall. Being that my foot was propped up onto leg holders

my foot (left) was exposed and immediately made violent contact with wall

as well. Due to my foot's position it was pinned between wall and wheelchair

"leg holders". I yelled in pain and as Gilbert continued to maneuver chair my foot

was bent awkwardly as it was pinned between chair and the wall. It went

unnoticed for a few seconds so I had made attempt to unpin my foot because

my expression of pain went without notice and he kept trying to maneuver chair instead of correct it. Gilbert finally notice me trying to dislodge my foot I assumed, so he turned chair in opposite direction slightly allowing me to move my foot. At this point we were off the elevator, but had to re-enter. In the process, directly following me removing my foot from between elevator's wall and wheelchair, Gilbert proceeded to maneuver chair back onto elevator instantly hitting my foot against wall again as he swung chair right. I stated once we were back onto elevator "f\*\*\* man you just f\*\*\* up my foot" along with other obscenities. I was furious and in pain after this, especially because I felt this would happen behind Gilbert's carelessness. Gilbert had no comment. Once we got off elevator onto correct floor and checked in with the floor station's nurse, another nurse came and escorted us to the room. I was rubbing my foot because of the pain, then Gilbert stated "I don't have my license for these things". The nurse escorting us laughed at his comment.

As we sat and waited for Dr. Harris to come (reason for appointment) both Gilbert and Sanchez showed discomfort and impatience due to long wait time. This was approx. between the times of 3:30pm and 4:15pm. As well, they made comments of "I'm ready to get off and get home." "What the f\*\*\* is taking dude so long." "Soon as we drop him off I'm out of here" etc. I sat in silence because I was injured and just wanted to get back to the jail so I could get some medical attention. Gilbert later asked "You good bro?" I stated I didn't know, my foot was hurting badly and that I needed some medical attention. They stated I probably would have to wait til I got back to jail; that they couldn't just wheel me down to the ER. I asked why not and they never gave me a definitive answer. I told them to make sure they let the jail know so they can give me some medical attention and not think in making this up. They agreed that they would.

We departed hospital and loaded in the van approx. 4:30pm - 4:45pm. As I was placed in the van, I again asked Gilbert and Sanchez to aid me with securing the safety belt. Gilbert stated

"figure the ~~score~~ out dude it isn't rocket science for christ sakes," and slammed the door. I heard Sanchez laugh. We sat idle in the van for about 5 mins, then the van lurched forward causing me to fall towards the rear of the van. I tried my hardest to brace myself against the speeds being driven, that were causing me to jerk from left to right, bounce up and down becoming slightly airborne at moments, but I didn't stand a chance. I yelled for officers to slow down numerous times but got the radio turned up as a result. The van came to a stop on two occasions and accelerated rapidly causing me to hit my head against the rear of the van. I was jarsted around in vehicle the whole ride back to jail up until we pulled up in jail's garage.

Once we arrived back at jail and doors to the van opened I confronted them asking which one of them was driving. I never received a definitive answer. Due to my foot being injured I was assisted when asked out of the van by Gilbert when he noticed my lip. Gilbert grabbed my arm aggressively. I limped into jail because of the pain I was experiencing and stopped to brace myself because I had become dizzy. I heard one of them state dude its not all that serious. I asked for clarification once I became balanced out and supported. I told them I asked them to be careful and to assist me with securing seat belt and they did neither and now im injured but its not that serious. Sanchez shrugged his shoulders. I reminded them to inform jail staff of all this so I can receive proper medical attention. Gilbert stated "Yeah, OK" sarcastically and Sanchez chuckled. After I was checked back into jail, I was escorted by G45 back to housing unit. As I waited to speak Unit Officers Peterson and Gil about my injuries, Gilbert threw my POD card (identification card) on to desk and he and Sanchez scurried off. I called for them and they kept going with no intentions on informing the jail of my substantiated injuries. This was 5pm when they left housing unit (5B).



## Conclusion

The whole time I were in G4S Officers Gilbert and Sanchez's possession, I pointed out my rights to safety and fear of injury, and reminded them that they had duties to perform while operating under the color of the state law. They were negligent, as well as deliberately indifferent to my right to safety from harm and injury. My 8<sup>th</sup> and 14<sup>th</sup> amendments were violated. They did not make any statement at any time about a policy that prohibited them from entering vehicle to help secure seatbelt for my safety. Hence they helped assist me into vehicle which contradicts said policy because they in part or whole entered vehicle to do so. As well (John Doe) spoke to me during a following transportation about hearing about the incident that occurred on 7/11. He at 4 times entered vehicle to secure seatbelt as well as release belts so im confused to this supposed policy.

I now suffer from physical injury including but not limited to left foot/ankle strain that has been long lasting that impede me from walking and standing normally and for periods of time without pain and discomfort. Head and neck injuries that have lead to inability to perform normal activities such as walk distances of 100 feet without discomfort and pain, stand for extended periods without discomfort and pain, sleep without disturbance from discomfort and pain from back pains that have gradually moved from head/neck, psychological damage from concussion sustained - also knowing that I may have to use a cane for and with walking and standing for the rest of my life, and injuries may now be irreparable. As well injuries are gradually getting worse and requires constant monitoring, therapy, and intake of medications daily. Im suing G4S for punitive and compensatory damages. Injuries aren't de minimus. Injuries were diagnosed by physicians as mandating treatment. Gilbert and Sanchez had a duty to be responsible and attentive. They breached that duty to be careful and/or avoid harm. That breach of duty has caused injury to person that the duty held them responsible for. G4S's company policy is said to have cause in part decision or whole, so im suing the company in its official capacity.

## Milwaukee County Jail

- Officer Peterson, Officer Nowak, Officer Larcen, Captain Straddler  
sued in their individual and official capacities. Who acted under the color  
of the state law. Officials were deliberately indifferent to serious medical  
needs by prolonging or impeding medical treatment and/or failing to ensure  
medical treatment was provided to avoid either irreparable injury and/or discomfort  
and pain that could have been avoided.

## Wellpath Healthcare

- Nurse Wysocki, Dr. Khan, RN Jines, Nurse Meredith, Jane Doe, Jane Doe,  
Jane Doe sued in their individual capacities. Who acted under the color of  
the state law as medical professionals. Officials were deliberately indifferent to  
serious medical needs when made aware of injury and needs, failure to provide  
adequate medical treatment to avoid discomfort, pain, and irreparable injury. Medical  
needs could be seen by any layman. Officials failed to provide treatment(s) that  
the medical community would deem highly appropriate and I suffered further  
injury.

At 5pm 7/11/19, I spoke with Officer Peterson informing him of the occurrences and injuries I suffered and asked him to call and inform medical staff so I could get medical attention. He told me he would. Forty minutes passed and no one had come so I went and ask Peterson did he call medical. He again said that he would, and to give him a minute. I told him I was in severe pain and in fear I might pass out behind my head injury. He told me he was going to call, I should wait a min. Then he stated it doesn't look to him like im injured. I told him its not his job to determine medical things, I just need him to contact medical staff. He laughed and said OK. That was 5:50pm approx. I went and laid down for a minute. I came and sat in dayroom by Officers desk and still no medical staff had come. This was 6:30pm. I ask Peterson did he call once more. He looked at me and stated "Dude why you sweating me." I told him he was playing games. I asked you several times to contact medical, im hurt and you've disregarded my need for medical attention. I asked him to call a Lieutenant. Peterson picked up the phone and spoke to someone for a couple seconds then hung up. He told me a nurse was on their way. I asked him why did it take him this long to call ~~after~~ I told him numerous times I was injured and experiencing dizziness. He never gave me an answer.

At 7pm Nurse Meredith came to housing unit and spoke with me. I told

her what I was experiencing (exactly as I told Peterson). She examined my injured foot and said it doesn't look broken and she wrapped it up with an ace wrap. I asked her can I get something for my headache and neck pain as well as foot/ankle pain and she told me yeah but she would have to talk to her supervisor first. When explaining my head injury to her she did nothing but look at me and smiled. She told me I would be seen the following day then she left. I received nothing for the pain.

The following day I informed (7/12) Officer Young that I had been told I would be seen by medical today and asked her to call and see if I still would be. She made a call then told me I wouldn't be seen today, no explanation, no nothing. I submitted medical request for service forms communicating my pain and discomfort with to medical staff and requesting services. I did not receive any medical services concluding that day (7/12), as I was told by Nurse Meredith I would. Going into the morning hours of (7/13) I could not rest due to my neck becoming stiff, experiencing chest pains, and dizziness. I informed officers to call a medical emergency. Supervisor came and gave me 400 mg of Ibuprofen. I was told I would be seen later that day and that she don't know about anything else. (Jane Doe)

~~At approximately 10:00 AM on 7/13/20, I was informed by Officer Young that I would be seen by medical today.~~



At 2:45 pm approx, a nurse came and did a concussion check (Jane Dee). I was told by her she would come do these checks for the next few days to make sure I did not have a concussions. That was the only day she came. I never received another concussion check or any monitoring for concussions moving forward. I reported symptoms of dizziness, lightheadedness, headaches, confusion, blackouts, etc. to nurses who came to housing unit, as well as communicated through medical health service forms.

At approximately 11:56 pm (7/13) I asked third shift Officer Nowak to contact medical because I was in severe pain along with my neck becoming more and more stiff, and I was starting to lose mobility. His exact words were "They're not going to do anything because it's not cardiac, diabetic, or seizure related. I asked him to call medical emergency please and he did not. Instead he left housing unit. I never received medical assistance that night.

On 7/14 approx. 2:39 pm, I was seen by medical practitioner Dr. Khan. I explained to him my injuries, how I suffered them, and all symptoms that followed. I asked for crutches or some means of support for walking due to it being difficult because of foot/ankle injury. He stated it isn't necessary because he believe me to only have a strain in my foot. I explained to him that it is extremely painful to walk and almost



impossible to walk without support, but he still denied me. We spoke about my head injury/neck pain. He stated an concussion isn't to be worried about because the incident happened days ago. I asked was he aware that a nurse had come stating she would monitor to me for concussion the next few days and had not. He said yeah not to worry. I explained to Dr. Khan I was still getting dizzy, and experiencing headaches and my neck was still stiff. I also informed him of the pain that was moving into my back. He told me he would order meds and physical therapy. I asked him could I get a CT Scan, MRI and/or Xray to see what was going on. I also asked him do they supposed to do this as procedure after someone suffer from those kind of injuries. He stated it's not that serious, then answered a phone call. I waited for him to finish his call then was told to keep my foot elevated, drink water, and rest. He said I'll be seen again in a few days. I asked again for crutches or something to aid me with walking and he denied me. On 7/15 I asked Officer Larcen could he grab a wheelchair for me because it was painful to walk when being escorted to HCU. He told me no. I showed him the ace wrap on my foot and explained my situation. He still told me no.

I was given Ibuprofen for 7 days. I informed medical that these meds didn't help with pain. I did not receive anything after 7 days. Dr. Khan order meds

but I did not receive them until I asked nurse in medical request form why wasn't I receiving anything. I went 4-5 days without pain meds that were prescribed to me. Nurse Marshall stated he didn't know why they wasn't giving them to me and he would put it through for me to continue additional days to make up for the days they were not given to me. After 7 days I was discontinued from pain meds.

I submitted many requests in attempts to communicate all medical issues to medical staff between the dates of 7/11 and 8/6. After submitting grievances complaining about jail and medical staff's actions and inactions being deliberately indifference to my medical needs (serious) someone came to speak to me.

On 8/6 approx. Nurse Wysocki came to speak with me. She stated Captain Straddlen told her to come speak with me after seeing grievances. I submitted many grievances, but not until I mention proceeding civilly did someone ask questions of "concern". She asked what was going on and I explained, I'm not receiving treatment that's helping my injuries, I'm being told I will receive treatments and monitoring that I've yet to receive. I've been asking for test and scans to rule out the possibilities of my injuries being serious than what I'm being told they are. Nurse Wysocki stated she didn't see any records from doctors speaking on anything other than my foot injury. I explained my head injury to her and informed her that I've submitted many request communicating all injuries including head injury, as well as it's improvement worsening and moving into my back. She said she would look into X-rays but she doesn't believe I needed testing but she'll see. It was another nurse present during this conversation as of now I don't know her name. Wysocki also stated she didn't have any complaints filed on or around injury date. I directed her to look because I've submitted many since. Then she left after telling me I would be seen shortly.

On 8/7 1:45pm approx. Practitioner Jines called me to HCU. We spoke and she told me she was only told to assess my foot injury, that no one told her or left any records about head injury or so forth.

I informed her as well I've been submitting medical forms communicating this and I had just spoken with Nurse Wysocki yesterday and told her additionally. I made Jines currently aware. If she had not been, I explained to her that my neck stiffness has progressed into back pain at this point. As well I feel my foot/ankle injury has worsen because I've had no support when walking around on it. She stated she believe my back pain to be muscular and she would order physical therapy. I informed her Dr. Khan stated he would order physical therapy almost a month ago and I haven't received any. She stated she didn't know what was going on, that nothing was ordered by him, and why I haven't received an X-ray of my foot and ~~there~~ there aren't any records documented. She said she ordered X-ray today (8/7). I explained the pain in my back doesn't feel muscular and I would like testing to confirm either/or. She told me she'll order me tylenol and Ibmuprofen but never stated anything about testing for my back. I asked her for crutches because it still was painful to walk, or at least anything to assist me. She stated the jail won't allow her to issue any for safety purposes. I pointed out there are several people in the jail with crutches and/or canes provided for and with mobility. She just shrugged her shoulders and said it's the policy, sorry.

I received a X-ray of my foot on 8/13, a month after initial injury (7/11). During the X-ray, Nurse, (Jane Doe) performed procedure without providing me protection from radiation until I asked her. She told first pic and I realized this and asked her was she supposed to give me something to cover my genitals, (as nurses have to post). She said sorry then gave me lead protector. She had on lead vest to cover/protect herself the whole time.

I receive physical therapy twice, on dates I believe to be 8/15 and 8/26. When I went to first appointment, Therapist (Jane Doe) stated she only had a referral to perform therapy for my back. I explained my foot issue and she stated she could tape it that's it. On the second session the therapist was in different to her duties. She didn't have me lay down to perform therapy like first session. She was agitated when I came in to room. She had me sit in chair when she placed electro stimulation pads on my back so I wasn't able to receive full treatment proper treatment. I submitted a grievance on 8/30 in regards to her performance but never received a response. I was transferred from Milwaukee County Jail to Dodge Correctional Facility on 9/3/19.



Captain Stoddler was made aware of officials' activities by way of grievances. Yet he made no attempts outside of sending Nurse Wyszski to speak with me after repeated grievances and finally, me conveying that I intended to proceed civilly. That's, when he sent a nurse to address concern(s). He did no follow ups to ensure medical and jail staff were providing me adequate medical treatment after communicating that were not prior to. I submitted grievances after nurse spoke to me communicating I still was not being afforded due medical treatment, but he still did not make further steps to remedy this. He remained indifferent. He was made aware of officials actions and/or inactions, yet he remained deliberately indifferent to my serious medical needs.

All jail officials: Peterson, Nowak, Larsen - were all deliberately indifferent to my serious medical needs by either not contacting medical staff when made aware of discomfort, pain, and/or symptoms that any layman could see needed medical attention. They instead made medical decisions as if they were medical professionals and denied or delayed access to medical attention or remain indifferent to the need for it. Peterson delayed medical attention for hours when asked to contact medical when made aware of pain and discomfort from injuries. As well stated it didn't look to him as if I was injured. He acted as if medical professional without training to do so and delay me medical attention. Nowak denied me medical attention by not contacting medical staff when told symptoms of discomfort and pain. Instead he stated medical staff would not provide me medical services because my needs weren't serious enough (cardiac, diabetic, or seizure related). Furthermore, he walked away leaving me in discomfort and pain without second thought. He was indifferent to my medical need. Larsen saw me in discomfort and denied me assistance when asked for a wheelchair to assist mobility temporarily. It is his duty to ensure safety of pretrial detainees and/or inmates housed at jail. He remained deliberately indifferent to medical need by denying assistance.

Officers made medical decisions as if medical professionals and denied me medical attention or prolonged it. They were as well negligent when they decided not to perform the trusted duties which was to ensure safety of inmates. I communicated needs to them, they chose

to act with deliberate indifference to possibilities of further injury, pain, and/or discomfort.

## Conclusion

I've exhausted my administrative remedies to the full extent possible. I submitted Prisoner Request slips, grievances, and medical request forms. I submitted approx. 12 grievances in my time at jail in regards to matters, only receiving four written responses to grievances bringing no remedy. I submitted numerous medical request for service forms between the <sup>dates</sup> of 7/11 and 9/3 in which I was transferred from facility so I could no longer ask Milwaukee County Jail and staff to right their wrongs. I was transferred to Dodge Correctional Institution where the medical staff there was asked to contact county jail for my medical records after I signed consent form to release all and any medical records to new facility so they would be made aware of injuries. They did not send files but partials containing documents of foot injuries but not all other medical issues and concerns.

I communicated with jail staff, both officers and medical, who all operated under the color of state law, about my injuries. They were made aware. Nurses, Doctors, and officers could see or look into and see they were serious medical needs, and if untreated could cause further injury, discomfort, and/or even become irreparable. Medical staff failed to provide medical testing, scans, and/or due process treatment that any medical community would deem due process to my injuries. I suffered further pain, discomfort, and further injury, that may be irreparable. Between the dates of 7/11 and 9/13 I asked for medical treatments, made complaints of discomfort and inability to perform normal activities due to injuries. As well I reported persisting pain and injury following <sup>injuries</sup> and my concern of things being worse than I was being told and they were. I spoke with high officials, through grievances and request slips about staffs indifference to my medical concerns and needs many times. I ask for medical treatment(s) that and medical community would deem necessary and provide. I did not receive these. I received deliberate indifference and I suffered further injury.



My right to medical care was violated. I received inadequate medical care. Medical staff knew I faced a substantial risk of serious harm and they disregarded that risk by failing to take reasonable measures to abate it. Jail officers violated my right to medical care by prolonging contacting medical staff and making medical decision without being medical professional. Officers told me I didn't look hurt and medical wouldn't do anything if things weren't seizure, diabetic, or cardiac related. Officers did not call medical when I communicated I had a medical emergency. Officer did not provide assistance when they could clearly see I needed assistance. Officers failed to act reasonably in response to known substantial risk of serious harm after it was made aware. Whether it was a custom or policy moving true behind violation I suffered. So I'm suing all parties for violation of right to medical care by being deliberately indifferent to right. As well as officers, and by doing so I suffered further damages/injury.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like the courts to award me \$500,000.00 for punitive  
damages as a result of my 8<sup>th</sup>, 14<sup>th</sup>, and 4<sup>th</sup> amendment rights being  
violated due to negligence and deliberate indifference resulting in  
physical, psychological, and emotional damages. Also compensatory  
damages and nominal damages to cover rehabilitation costs, fees for  
imagery studies, testing, and exams in the future. As well to compensate the  
living costs due to my inability to perform normal labor to provide for  
myself due to injuries (initial and further injuries that followed).

E. JURY DEMAND

☐ Jury Demand - I want a jury to hear my case.  
OR

☒ Court Trial - I want a judge to hear my case

Dated this 16<sup>th</sup> day of January 2020.

Respectfully Submitted,

Clarence Saffold  
Signature of Plaintiff

543727  
Plaintiff's Prisoner ID Number

Bacne Correctional Institution

PO Box 900 Sturtevant, WI 53177  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.



STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

Josh Kaul  
Attorney General

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2020 JAN 21 P 2:38

STEPHEN C. DRIES  
CLERK

17 W. Main Street  
P.O. Box 7857  
Madison, WI 53707-7857  
www.doj.state.wi.us

Jocelyn S. Gaddini  
Legal Associate  
gaddinijs@doj.state.wi.us  
608-264-6202

**Instruction To Offender:** You must send original Certification to the Court.

CERTIFICATION  
AS TO THREE OR MORE DISMISSALS  
UNDER WIS. STAT. § 801.02(7)(d)

OFFENDER NAME: Clarence A. Saffold III

WI DOC OFFENDER NUMBER: #543727

THE UNDERSIGNED CERTIFIES THAT:

X The Wisconsin Department of Justice has no records showing that this offender has three or more dismissals within the meaning of Wis. Stat. § 801.02(7)(d).

— The Wisconsin Department of Justice has records it believes show that this offender has three or more dismissals within the meaning of Wis. Stat. § 801.02(7)(d). These records are public records within the meaning of Wis. Stat. §§ 908.03(8), 909.015(7), and 909.02(4), in that they are on file in the offices of the Wisconsin Department of Justice, reflect the activities of that Department, and set forth matters observed by that Department pursuant to duty imposed on it by law. True copies of these records are attached here to and their case name, number, and venue are as follows:

Attached hereto is a true copy of the offender's request for this certification, bearing the Department of Justice date stamp.

Witness under my hand and the official seal of the Wisconsin Department of Justice, Office of the Attorney General, this 31st day of October 2019.

  
Jocelyn S. Gaddini

